

# UNITED STATES DISTRICT COURT

for the

NORTHERN District of NEW YORK

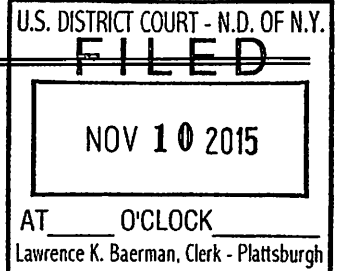
United States of America )

v. )

Case No. 8:15-MJ-413 (GLF)

AMIN, Samar Kassim )

*Defendants* )



## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

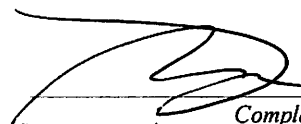
On or about the date of November 8, 2015 in the county of Clinton in the Northern District of New York, the defendants violated 8 U. S. C. § 1324 (a)(1)(A)(ii) an offense described as follows:

AMIN, Samar Kassim, the defendant, knowing and in reckless disregard of the fact that SAMOUCHEV, Anatoli, person that is alien, had come to, entered, or remained in the United States in violation of law, did transport and move or attempt to transport and move such alien within the United States by means of motor vehicle transportation or otherwise, in furtherance of such violation of law, in violation of Title 8, United States Code, Section 1324(a)(1)(A)(ii).

The criminal complaint is based on these facts:

On November 8, 2015 at approximately 1:00 PM, Swanton Sector dispatch (KAD 640), alerted Champlain Border Patrol Agents that the Royal Canadian Mounty Police (RCMP) notified them they had a subject running across Meridian Road on the Canadian side of the international border, near Champlain, New York. Meridian Road runs north and south, it is intersected by the United States and Canada border. At the United States and Canada border on Meridian Road there is a gate accompanied by signs and a monument clearly demarcating the international boundary. A short while later KAD 640 advised that they had visual of one bald Caucasian male subject wearing sunglasses and a black hooded coat walking west to east on the United States side of the international border. Agents responded to the area but were unable to locate the subject on foot at that time.

X Continued on the attached sheet.

  
 Complainant's signature  
 Christina Dengler  
 Cindy Reyna, Border Patrol Agent  
 Printed name and title

Sworn to before me and signed in my presence.

Date: November 10, 2015

  
 Judge's signature

City and state: Plattsburgh, NY

Gary L. Favro, U.S. Magistrate Judge, N.D.N.Y.  
 Printed name and title

**Continuation Sheet for United States of America V. Samar Kassim AMIN**

Agent Carlson was observing traffic while parked on Route 9 (Main St.) in Champlain, New York. At 2:07 PM, Agent Carlson observed two male subjects in a gray Toyota Prius with a Florida license plate pass his location. The Prius was heading south on the bridge at Elm St. and Main St. in Champlain, New York just south of Meridian Road. The passenger was a Caucasian male with a mostly bald head, wearing sunglasses and a black hooded coat matching the description KAD 640 had provided. Agent Carlson requested registration information as well as a lane check for international border crossing information from KAD 640. Sector dispatch advised the vehicle crossed the U.S./Canada border at the Champlain Port of Entry at 1:11 PM with a single occupant. At this time BPA Carlson performed a vehicle stop on Interstate 87 just south of the Lavalley Road overpass.

The passenger was identified as SAMOUCHEV, Anatoli and the driver was identified as AMIN, Samar Kassim. They were questioned as to their citizenship and status in the United States. SAMOUCHEV produced a Canadian passport and AMIN presented a Florida driver's license. BPA Carlson asked the occupants as to their entry to which AMIN claimed he crossed the international border in his vehicle, corroborating with the lane check KAD 640 reported for the Florida plated vehicle. SAMOUCHEV claimed he had crossed on a Greyhound bus and was dropped off at the city. BPA Carlson requested crossing history on SAMOUCHEV through sector dispatch at approximately 2:24PM and was advised there was no crossing history on SAMOUCHEV for today. At that time SAMOUCHEV and AMIN were transported to the Border Patrol Station in Champlain, New York for further questioning.

Record checks revealed that Anatoli SAMOUCHEV is a citizen of Canada but was born in Bulgaria. Samar Kassim AMIN is a Naturalized United States Citizen but was born in Bulgaria.